

UNITED STATES OF AMERICA : **CRIMINAL NO.** **04-680**

v. **DATE FILED:** _____

VIOLATIONS:

21 U.S.C. § 846 (conspiracy to distribute cocaine - 1 count)

21 U.S.C. § 841(a)(1) (distribution of cocaine - 24 counts)

21 U.S.C. § 860 (distribution of cocaine within 1000 feet of a school - 18 counts)

21 U.S.C. § 841(a)(1) (possession of cocaine with the intent to distribute - 3 counts)

21 U.S.C. § 860 (possession of cocaine within 1000 feet of a school with the intent to distribute - 1 count)

21 U.S.C. § 841(a)(1) (possession of cocaine base with the intent to distribute - 1 count)

21 U.S.C. § 860 (possession of cocaine base within 1000 feet of a school with the intent to distribute - 1 count)

18 U.S.C. § 924(c) (possession of a firearm in connection with a drug trafficking offense - 2 counts)

18 U.S.C. § 922(g) (possession of a firearm by a convicted felon - 2 counts)

18 U.S.C. § 2 (aiding and abetting)

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about July 2003, through in or about October 2004, in Philadelphia and in Delaware County, in the Eastern District of Pennsylvania, defendants

**TYRONE SMITH,
a/k/a “Tiddy,”
WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”
LOUIS STILLIS,
a/k/a “Lou Bop,”
KENNETH WILSON,
a/k/a “Kenny,”
SHERRON MOORE,
a/k/a “Manny,”
TYRONE TRADER,
a/k/a “Saleem,”
JAMAL RIDEOUT,
a/k/a “Dub,”
RICHARD ROBINSON, and
LARRY DAVIS,
a/k/a “L,”**

conspired and agreed, together with others known and unknown to the grand jury, to knowingly and intentionally distribute more than five kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. The defendants were members of a drug distribution organization that distributed cocaine in Philadelphia and in Delaware County, Pennsylvania.

3. Defendant TYRONE SMITH, a/k/a “Tiddy,” was a supplier of large quantities of cocaine, ranging from approximately 250 grams to approximately one kilogram, which he distributed to defendant WILLIAM GREEN, a/k/a “Fidel,” a/k/a “Foo,” and others for redistribution in Delaware County, Pennsylvania.

4. Defendant TYRONE SMITH used a house at 3335 Goodman Street in Philadelphia to store cocaine, drug paraphernalia, records of the sales of controlled substances, cash proceeds from the sales of controlled substances, and a firearm.

5. Defendant WILLIAM GREEN distributed cocaine he received from defendant TYRONE SMITH to defendant LOUIS STILLIS, a/k/a “Lou Bop,” and to other members of the conspiracy, for further redistribution in Delaware County, Pennsylvania.

6. Defendant WILLIAM GREEN used a house at 118 Youngs Avenue, Woodlyn, Pennsylvania to store cocaine, drug paraphernalia, cash proceeds from the sale of cocaine, a firearm and ammunition.

7. Defendant LOUIS STILLIS distributed cocaine to numerous buyers in Delaware County, Pennsylvania, and used other members of the conspiracy, including defendants KENNETH WILSON, a/k/a “Kenny,” SHERRON MOORE, a/k/a “Manny,” TYRONE TRADER, a/k/a “Saleem,” JAMAL RIDEOUT, a/k/a “Dub,” RICHARD ROBINSON, and

LARRY DAVIS, a/k/a "L," to distribute cocaine to numerous street-level buyers, and to transport cocaine and to collect money from the sales of cocaine.

8. Defendant LOUIS STILLIS used various locations in Chester Township, Delaware County, to store cocaine and firearms used to further the goals of the conspiracy.

OVERT ACTS

_____ In furtherance of the conspiracy, and to accomplish its objects, the following overt acts were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about June 27, 2003, in Aston, Pennsylvania, defendant TYRONE TRADER sold approximately 1.3 grams of cocaine to an undercover police officer for \$150.
2. On or about August 6, 2003, in Brookhaven, Pennsylvania, defendant LARRY DAVIS sold approximately 3.9 grams of cocaine to an undercover police officer for \$160.
3. On or about August 26, 2003, in, Brookhaven, Pennsylvania, defendant RICHARD ROBINSON sold approximately 5.18 grams of cocaine to an undercover police officer for \$160.
4. On or about September 12, 2003, in Chester, Pennsylvania, defendant RICHARD ROBINSON sold approximately 5.9 grams of cocaine to an undercover police officer for \$250.
5. On or about September 18, 2003, in Brookhaven, Pennsylvania, defendant RICHARD ROBINSON sold approximately 11.3 grams of cocaine to an undercover police officer for \$500.
6. On or about October 7, 2003, in Brookhaven, Pennsylvania, defendant LARRY DAVIS sold approximately 3 grams of cocaine to an undercover police officer for \$160.

7. On or about December 19, 2003, in Brookhaven, Pennsylvania, defendant LARRY DAVIS sold approximately 5.7 grams of cocaine to an undercover police officer for \$250.

8. On or about February 18, 2004, in Brookhaven, Pennsylvania, defendant LOUIS STILLIS sold approximately 124.9 grams of cocaine to an undercover police officer for \$4,200.

9. On or about April 1, 2004, in Brookhaven, Pennsylvania, defendant JAMAL RIDEOUT sold approximately 54.5 grams of cocaine to an undercover police officer for \$2,000.

10. On or about May 6, 2004, in Brookhaven, Pennsylvania, defendant LOUIS STILLIS sold approximately 119.8 grams of cocaine to an undercover police officer for \$4,200.

11. On or about June 16, 2004, in Chester, Pennsylvania, defendant TYRONE TRADER sold approximately 13 grams of cocaine to an undercover police officer for \$575.

12. On or about July 15, 2004, in Brookhaven, Pennsylvania, defendants LOUIS STILLIS and TYRONE TRADER sold approximately 244.3 grams of cocaine to an undercover police officer for \$8,000.

13. On or about July 16, 2004, in Aston, Pennsylvania, defendant KENNETH WILSON sold approximately .91 grams of cocaine to an undercover police officer for \$40.

14. On or about July 23, 2004, in Philadelphia, Pennsylvania, defendant TYRONE SMITH delivered approximately 500 grams of cocaine to defendant WILLIAM GREEN.

15. On or about July 23, 2004, in Woodlyn, Pennsylvania, defendant WILLIAM GREEN delivered approximately 500 grams of cocaine to defendant LOUIS STILLIS.

16. On or about August 4, 2004, in Philadelphia, Pennsylvania, defendant WILLIAM GREEN paid money to defendant TYRONE SMITH for cocaine.

17. On or about August 5, 2004, in Chester, Pennsylvania, defendant TYRONE SMITH delivered cocaine to defendant WILLIAM GREEN.

18. On or about August 11, 2004, in Chester, Pennsylvania, defendant WILLIAM GREEN delivered cocaine to defendant KENNETH WILSON.

20. On or about August 11, 2004, in Upland, Pennsylvania, defendant KENNETH WILSON delivered approximately 125 grams of cocaine to defendant LOUIS STILLIS for \$3600.

21. On or about August 16, 2004, in Philadelphia, Pennsylvania, defendant TYRONE SMITH delivered approximately 500 grams of cocaine to defendant WILLIAM GREEN.

22. On or about August 21, 2004, in Philadelphia, Pennsylvania, defendant TYRONE SMITH delivered approximately 1000 grams of cocaine to defendant WILLIAM GREEN.

23. On or about August 21, 2004:

a. Defendant KENNETH WILSON, at the direction of defendant LOUIS STILLIS, went to 118 Youngs Avenue, Woodlyn, Pennsylvania, where defendant WILLIAM GREEN provided him with approximately 498 grams of cocaine.

b. Defendant KENNETH WILSON delivered approximately 498 grams of cocaine to defendant LOUIS STILLIS in Upland, Pennsylvania.

24. On or about September 5, 2004, in Philadelphia, Pennsylvania, defendant TYRONE SMITH and an individual known to the grand jury as DH, possessed approximately \$1,200,000 in United States Currency that was proceeds from the sale of cocaine and which was intended to be used as payment for cocaine.

25. On or about September 9, 2004, at 3335 Goodman Street, Philadelphia, Pennsylvania, defendant TYRONE SMITH possessed approximately 1,547 grams of cocaine, drug paraphernalia, a loaded Star 9mm semi-automatic pistol, additional ammunition and approximately \$212,168 in cash.

26. On or about September 9, 2004, at 118 Youngs Avenue, Woodlyn, Pennsylvania, defendant WILLIAM GREEN possessed approximately 144.4 grams of cocaine.

27. On or about September 9, 2004, at 118 Youngs Avenue, Woodlyn, Pennsylvania, defendant WILLIAM GREEN knowingly possessed a firearm, that is, a loaded Grendel Inc. .380 caliber semi-automatic pistol.

28. On or about September 30, 2004, in Brookhaven, Pennsylvania, defendant JAMAL RIDEOUT sold approximately 27.9 grams of cocaine to an undercover police officer for \$950.

29. On or about September 30, 2004, in Brookhaven, Pennsylvania, defendant SHERRON MOORE sold approximately 7.1 grams of cocaine to an undercover police officer for \$380.

30. On or about October 3, 2004, in Brookhaven, Pennsylvania, defendant TYRONE TRADER sold approximately 10.8 grams of cocaine to an undercover police officer for \$440.

33. On or about October 6, 2004, defendant RICHARD ROBINSON possessed approximately 34.29 grams of cocaine for resale.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**TYRONE TRADER
a/k/a "Saleem,"**

knowingly and intentionally distributed approximately 1.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 27, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**TYRONE TRADER,
a/k/a "Saleem,"**

knowingly and intentionally distributed approximately 1.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LARRY DAVIS,
a/k/a "L,"**

knowingly and intentionally distributed approximately 3.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2003, in Delaware County, in the Eastern District of Pennsylvania, the defendant

**LARRY DAVIS,
a/k/a "L,"**

knowingly and intentionally distributed approximately 3.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 26, 2003, in Brookhaven, Delaware County, in the Eastern District of Pennsylvania, defendant

RICHARD ROBINSON

knowingly and intentionally distributed approximately 5.18 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 26, 2003, in Brookhaven, Delaware County, in the Eastern District of Pennsylvania, the defendant

RICHARD ROBINSON

knowingly and intentionally distributed approximately 5.18 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 12, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

RICHARD ROBINSON

knowingly and intentionally distributed approximately 5.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) .

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 18, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

RICHARD ROBINSON

knowingly and intentionally distributed approximately 11.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 18, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

RICHARD ROBINSON

knowingly and intentionally distributed approximately 11.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LARRY DAVIS,
a/k/a "L,"**

knowingly and intentionally distributed approximately 3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LARRY DAVIS,
a/k/a "L,"**

knowingly and intentionally distributed approximately 3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a) and 841(b)(1)(C).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LARRY DAVIS,
a/k/a "L,"**

knowingly and intentionally distributed approximately 5.7 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2003, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LARRY DAVIS,
a/k/a "L,"**

knowingly and intentionally distributed approximately 5.7 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 18, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LOUIS STILLIS,
a/k/a “Lou Bop,”**

knowingly and intentionally distributed approximately 124.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 18, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LOUIS STILLIS,
a/k/a “Lou Bop,”**

knowingly and intentionally distributed approximately 124.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2004, in Delaware County, in the Eastern District of
Pennsylvania, defendant

**JAMAL RIDEOUT,
a/k/a “Dub,”**

knowingly and intentionally distributed approximately 54.5 grams of a mixture or substance
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**JAMAL RIDEOUT,
a/k/a “Dub,”**

knowingly and intentionally approximately 54.5 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 6, 2004, in Delaware County, in the Eastern District of
Pennsylvania, defendant

**LOUIS STILLIS,
a/k/a “Lou Bop,”**

knowingly and intentionally distributed approximately 119.8 grams of a mixture or substance
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1, (b)(1)(C).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 6, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LOUIS STILLIS,
a/k/a “Lou Bop,”**

knowingly and intentionally distributed approximately 119.8 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 16, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**TYRONE TRADER,
a/k/a "Saleem,"**

knowingly and intentionally distributed approximately 13 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendants

**LOUIS STILLIS,
a/k/a “Lou Bop,” and
TYRONE TRADER,
a/k/a “Saleem,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 244.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and Title 18, United States Code, Section 2 .

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LOUIS STILLIS,
a/k/a “Lou Bop,” and
TYRONE TRADER,
a/k/a “Saleem,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 244.3 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C) and Title 18, United States Code, Section 2 .

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 16, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**KENNETH WILSON,
a/k/a “Kenny,”**

knowingly and intentionally distributed approximately .91 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 16, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**KENNETH WILSON,
a/k/a “Kenny,”**

knowingly and intentionally distributed approximately .91 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Northley Middle School, a public elementary and secondary school located at 2801 Concord Road, Aston, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 23, 2004, in Philadelphia County, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed 500 grams or more, that is, approximately 500 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 23, 2004, in Philadelphia County, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed 500 grams or more, that is, approximately 500 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Triumph Christian Elementary School, a private elementary school located at 1536 West Wingohocking Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(B).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 23, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”**

knowingly and intentionally distributed 500 grams or more, that is, approximately 500 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2004, in Delaware County, in the Eastern District of
Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of
cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Chester Charter School, a public elementary school located at 2717 West 10th Street, Chester, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”**

knowingly and intentionally distributed approximately 125 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**KENNETH WILSON,
a/k/a “Kenny,”**

knowingly and intentionally distributed approximately 125 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 16, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed 500 grams or more, that is, approximately 500 grams, of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 16, 2004, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy”**

knowingly and intentionally distributed approximately 500 grams of a mixture or substance
containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of
the real property comprising the Triumph Christian Elementary School, a private elementary
school located at 1536 West Wingohocking Street, Philadelphia, Pennsylvania, in violation of Title
21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(B).

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 21, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed 500 grams or more, that is, approximately 1000 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 21, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally distributed over 500 grams, that is, approximately 1000 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Triumph Christian Elementary School, a private elementary school located at 1536 West Wingohocking Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(B).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 21, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendants

**WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”and
KENNETH WILSON,
a/k/a “Kenny,”**

knowingly and intentionally distributed approximately 498 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally possessed with the intent to distribute 500 grams or more, that is, approximately 1,547 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly and intentionally possessed with the intent to distribute 500 grams or more, that is, approximately 1,547 grams, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Mary Bethune School, a public elementary school, located at 3301 Old York Road in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(B).

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a "Tiddy,"**

knowingly and intentionally possessed with the intent to distribute 50 grams or more, that is, approximately 582 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a "Tiddy,"**

knowingly and intentionally possessed with the intent to distribute 50 grams or more, that is, approximately 582 grams, of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II controlled substance, within 1,000 feet of the real property comprising the Mary Bethune School, a public elementary school, located at 3301 Old York Road in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a), 841(b)(1)(A).

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TYRONE SMITH,
a/k/a “Tiddy,”**

knowingly possessed a firearm, that is, a loaded Star 9 mm semiautomatic pistol, serial number 2147819, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute a controlled substance and possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”**

knowingly and intentionally possessed with intent to distribute approximately 144.4 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”**

knowingly and intentionally possessed a firearm that is, a loaded Grendel .380 caliber semiautomatic pistol, serial number 9696, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession of a controlled substance with the intent to distribute, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 9, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**WILLIAM GREEN,
a/k/a “Fidel,”
a/k/a “Foo,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a loaded Grendel .380 caliber semiautomatic pistol, serial number 9696.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(e).

COUNT FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**JAMAL RIDEOUT,
a/k/a “Dub,”**

knowingly and intentionally distributed approximately 27.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**JAMAL RIDEOUT,
a/k/a “Dub,”**

knowingly and intentionally distributed approximately 27.9 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**SHERRON MOORE,
a/k/a “Manny,”**

knowingly and intentionally distributed approximately 7.1 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**SHERRON MOORE,
a/k/a “Manny,”**

knowingly and intentionally distributed approximately 7.1 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 3, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**TYRONE TRADER,
a/k/a “Saleem,”**

knowingly and intentionally distributed approximately 10.8 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 3, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**TYRONE TRADER,
a/k/a “Saleem,”**

knowingly and intentionally distributed approximately 10.8 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising the Toby Farms Elementary School, a public elementary school located at 201 Bridgewater Road, Brookhaven, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Sections 860(a) and 841(b)(1)(C).

COUNT FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 6, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

RICHARD ROBINSON

knowingly and intentionally possessed with intent to distribute approximately 34.29 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 22, 2004, in Delaware County, in the Eastern District of Pennsylvania, defendant

**LOUIS STILLIS,
a/k/a “Lou Bop,”**

having been convicted in a court of the Commonwealth of Massachusetts of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a loaded Lorcin 9mm semiautomatic pistol, Serial Number 133831.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney